

**FORMS AND INSTRUCTIONS  
FOR INVESTOR-OWNED UTILITIES &  
ENERGY SERVICE PROVIDERS  
SUBMITTING  
RETAIL ELECTRICITY PRICE DATA**

In support of the  
*2007 Integrated Energy Policy Report*

**COMMISSION REPORT**

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Arnold Schwarzenegger, Governor

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## **Abstract**

The staff of the California Energy Commission's Electricity Analysis Office prepared these instructions and forms to collect specific financial and sales data from selected investor-owned utilities and energy service providers in California. Responses to this data request will be used to prepare a forecast of average retail electricity prices for 2007 through 2018.

## **Keywords**

Retail electricity price forecast, data request, investor-owned utilities, energy service providers

# Executive Summary

As part of the California Energy Commission's *2007 Integrated Energy Policy Report*, the staff will prepare a ten-year forecast of retail electricity prices. Financial data for this forecast must include data provided by California's three largest investor-owned utilities (IOUs) and five largest energy service providers (ESPs).

This report instructs the IOUs and ESPs to provide specific financial data to the Energy Commission. To facilitate this data collection effort, the staff prepared an Excel Workbook for each IOU and ESP. These Excel Workbooks are the Energy Commission-adopted forms.

Each IOU's Excel Workbook contains the following forms:

- Form 1.a – IOU Revenue Requirements by Major Cost Categories/Unbundled Rate Component
- Form 1.b – Revenue Requirements Allocation by Bundled Customer Class and for Direct Access Service Customers (provided as two forms)
- Form 1.c – Electricity Sales Forecast for Bundled Customer Classes and for Direct Access Customers (provided as two forms)
- Form 2 – Electricity Sales in 2005 by Commercial/Industrial Rate Schedule and Selected NAICS Categories
- Form 3 – Residential Electricity Sales in 2004 and in 2005 by Baseline Percentages for Basic Accounts and All-Electric Accounts (provided as two forms)
- Form 4 – Pricing Factors for Purchased Power

In addition to completing each data form, this report directs the IOUs to provide answers to survey questions regarding the number of residential consumers whose bills included electricity priced at Tier 3, 4, and 5 rates.

Each ESP's Excel Workbook contains the following forms:

- Form 1 – Estimated Power Supply Costs
- Form 4 – Pricing Factors for Purchased Power

In addition to completing each data form, this report directs the ESPs to provide answers to survey questions regarding their historical transmission expenses and on how costs other than for power purchases affect direct access customers' electricity prices.

This report's filing instructions explain when, where, and how to file completed data forms and written responses to the survey questions. Its general instructions explain how to express all financial data.

## Background

The California Energy Commission is requesting selected financial and sales information from each of California's largest electric IOUs, publicly owned utilities (POUs),<sup>1</sup> and ESPs. This information will be used by the staff to forecast average retail electricity prices for 2007 through 2018. Average prices, not prices under specific rate schedules, will be projected for four classes of retail electricity customer in each IOU and POU service territory: residential, commercial, industrial, and agricultural. ESP prices will be forecasted for residential and non-residential customers only.

The initial use of this forecast will be as input to the Energy Commission's forecast of electricity demand. Specifically, forecasted changes in electricity prices are assumed to affect how much electricity consumers will buy. In addition, an Energy Commission-adopted retail price forecast will be published as part of the *2007 Integrated Energy Policy Report (IEPR)*.

This is the only long-term forecast of retail electricity prices prepared by a California state agency. It does not duplicate other state agency work.

The Energy Commission uses the retail price forecast to evaluate the cost-effectiveness of state energy policies. For example, it evaluates the economics of proposed changes to the Title 24 building energy efficiency standards using the forecast. Another Energy Commission use of the retail price forecast is for calculating paybacks for energy-saving equipment installations on public buildings.

The Energy Commission's adopted retail price forecast is used by other government agencies to budget for their facilities' utility bills. Throughout the year, Energy Commission staff also directs the public to its published retail price forecast. Public uses of the retail price forecast include budgeting for electricity bills and evaluating the cost-effectiveness of energy efficiency and distributed generation projects.

The state law mandating the *IEPR*, Chapter 568 of the Statutes of 2002, requires the Energy Commission to conduct an "assessment of ...the outlook for...retail prices...for...electricity...under current market structures and expected market conditions."<sup>2</sup> To perform this forecast, the Energy Commission is authorized to "require submission of demand forecasts, resource plans, market assessments, and related outlooks from electric...utilities...and other market participants."<sup>3</sup> For this price forecast, "other market participants" are the state's major ESPs providing electricity services to direct access (DA) customers within the service territories of

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<sup>1</sup> A separate set of forms and instructions will be published by the Energy Commission for publicly owned utilities.

<sup>2</sup> Public Resources Code Section 25303 (a)(1)

<sup>3</sup> Public Resources Code Section 25301 (a)

California's three largest electric IOUs. Furthermore, the Energy Commission's regulations require "each electric...utility to submit, according to forms and instructions adopted by the Commission, a forecast of energy prices which corresponds to the utility's demand forecast and resource plan. Each electric utility shall also submit *a forecast of utility financial variables* consistent with the forecast and plan (emphasis added)."<sup>4</sup>

This data request is one of three requests issued to date by the Energy Commission to California's electric utilities and ESPs for the 2007 IEPR. In October 2006, the staff issued [CEC-200-2006-001-CMD](#), requesting data to support an electricity demand forecast. The staff issued [CEC-100-2006-002-CMF](#) on January 5, 2007, requesting copies of utilities' and ESPs' resource (procurement) plans to support the Energy Commission's assessment of long-term electricity supply. Each electric utility or ESP response to this retail-price data request should be consistent with the demand forecasts and electricity resource (procurement) plans submitted to the Energy Commission under these two previous data requests (that is, data submitted under *Demand Forms 1.1 through 6* and *Supply Forms S-1 through S-5*, as applicable).

If respondents have questions about the information being requested or find a part of these instructions to be ambiguous, Energy Commission staff will work with utility or ESP staff to clarify what information is being requested. General questions about the forms or instructions should be directed to Mignon Marks at [mmarks@energy.state.ca.us](mailto:mmarks@energy.state.ca.us) or (916) 654-4732 or to Ruben Tavares at [rtavares@energy.state.ca.us](mailto:rtavares@energy.state.ca.us) or (916) 654-5171. More specific questions may be directed to the following Electricity Analysis Office staff members, who have been assigned to prepare retail price forecasts for the following IOUs and ESPs:

Staff Contacts	Utilities and ESPs
Mignon Marks, <a href="mailto:mmarks@energy.state.ca.us">mmarks@energy.state.ca.us</a> (916) 654-4732	APS Energy Services, Constellation NewEnergy, Pilot Power Group, Sempra Energy Solutions, Strategic Energy
Mary Ann Miller, <a href="mailto:mmiller@energy.state.ca.us">mmiller@energy.state.ca.us</a> (916) 654-4813	SDG&E
Nancy Tronaas, <a href="mailto:ntronaas@energy.state.ca.us">ntronaas@energy.state.ca.us</a> (916) 654-3864	SCE
Ron Wetherall, <a href="mailto:rwethera@energy.state.ca.us">rwethera@energy.state.ca.us</a> (916) 654-4831	PG&E

<sup>4</sup> California Code of Regulations, Title 20. Public Utilities and Energy, Division 2. State Energy Resources Conservation and Development Commission, Chapter 3. Data Collection, Article 2. Forecast and Assessment of Energy Loads and Resources, Section 1348. Pricing and Financial Information, *Energy Commission's Regulations*, Publication No. CEC-140-2006-001, <http://www.energy.ca.gov/2006publications/CEC-140-2006-001/CEC-140-2006-001.PDF>.

# Filing Instructions

## When to File

In adopting these *Forms and Instructions*, the Energy Commission is requiring that the utilities and ESPs file the specified financial and sales data, using the forms provided by the Energy Commission, on or before March 16, 2007.

At a later date, the *IEPR* Committee, comprising two Energy Commissioners, may direct additional data be filed to assess particular scenarios, topical issues, or policy recommendations.

## Who Must File

Every electric utility and energy service provider in California with retail electricity customers and whose peak retail loads were greater than 200 megaWatts (MW) in either 2005 or 2006 must file the requested data using the applicable forms and according to these written instructions.

The Energy Commission staff has identified the following electric utilities and ESPs that it believes meet the 200 MW criterion:

- IOUs – Pacific Gas and Electric (PG&E), San Diego Gas and Electric (SDG&E), and Southern California Edison (SCE).
- ESPs – APS Energy Services, Pilot Power Group, Strategic Energy, Sempra Energy Solutions, Constellation New Energy, Inc.

The table on page 5 identifies which forms each IOU or ESP is responsible for completing and submitting to the Energy Commission.

## ***Exemptions for Small Load-Serving Entities***

For this specific *IEPR* proceeding, the Energy Commission is not requesting data for a retail price forecast from any utility or ESP with peak retail loads less than 200 MW in both 2005 and 2006.



## What Must Be Filed

To expedite the data-collection-and-submittal process, an Excel Workbook (.xls file), containing labeled tabs for each Worksheet (required form) has been prepared for each IOU and ESP. Once adopted by the Energy Commission, this customized Excel Workbook will be e-mailed to each IOU and ESP. In addition, templates of “generic” IOU and ESP forms will be posted as Excel Workbooks on the Energy Commission website at:

[www.energy.ca.gov/2007\\_energypolicy/datacollection/](http://www.energy.ca.gov/2007_energypolicy/datacollection/)

Respondents are required to provide the following:

- A brief cover letter, addressed to the Energy Commission’s Docket Office and referencing Docket No. **06-IEP-1H**
- A compact disc containing all required data that has been stored in the appropriate Excel Workbook, plus any other electronic files in Microsoft Word or Excel, and
- One paper copy of each completed data form (Excel Worksheet) and a paper copy of each Microsoft Word file.

Printed copies of completed forms must include the Excel Worksheet row and column headings. Please follow these steps to ensure that these headings are included with each printed form:

- Open the Excel Worksheet,
- Go to “File,” then “Page Set-Up...”
- Select the “Sheet” tab, click the “Row and Column Headings” box, and then hit “OK.”
- Go to back to “File,” and then “Print.”
- Choose to print either the “Active Sheet” or the “Entire Workbook.”

Do not submit any electronic data in portable document format (PDF).

If used, the *Application for Confidential Designation* form must be submitted as a paper copy because of the need for a “wet” signature for the “Penalty of Perjury” certification.

If any requested data is not applicable to a respondent, that portion of the Worksheet can be left blank. The Energy Commission staff, however, requests that respondents explain in writing (for example, in the cover letter) why the data was not provided.

<b>Load-Serving Entity</b>	<b>Revenue Requirements/ Total Estimated Costs</b>	<b>Revenue Requirements/ Cost Allocation by Customer Class/Type</b>	<b>Sales by Customer Class/Type</b>	<b>Sales by C&amp;I Rates and NAICS</b>	<b>Residential Sales by Baseline Percentages</b>	<b>Pricing Factors for Purchased Power</b>
<b>PG&amp;E</b>	Form 1.a (IOU)	Form 1.b (IOU-Bundled) and Form 1.b (IOU-DA)	Form 1.c (IOU)	Form 2	Form 3 – Basic Form 3 – All Electric	Form 4 (IOU)
<b>SCE</b>	Form 1.a (IOU)	Form 1.b (IOU-Bundled) and Form 1.b (IOU-DA)	Form 1.c (IOU)	Form 2	Form 3 – Basic Form 3 – All Electric	Form 4 (IOU)
<b>SDG&amp;E</b>	Form 1.a (IOU)	Form 1.b (IOU-Bundled) and Form 1.b (IOU-DA)	Form 1.c (IOU)	Form 2	Form 3 – Basic Form 3 – All Electric	Form 4 (IOU)
<b>APS</b>	Form 1 (ESP)					Form 4 (ESP)
<b>Constellation New Energy</b>	Form 1 (ESP)					Form 4 (ESP)
<b>Pilot Power Group</b>	Form 1 (ESP)					Form 4 (ESP)
<b>Sempra Energy Solutions</b>	Form 1 (ESP)					Form 4 (ESP)
<b>Strategic Energy</b>	Form 1 (ESP)					Form 4 (ESP)

## Where to File Completed Forms

Once completed, please submit all forms to:

California Energy Commission  
Docket Office  
Attention: **Docket 06-IEP-1H**  
1516 Ninth Street, MS-4  
Sacramento, CA 95814-5512

Data that is submitted with an *Application for Confidential Designation*, however, must be sent to the Executive Director of the Energy Commission rather than to the Docket Office, as explained in the next section.

## How to Apply for Confidential Designation of Submitted Data

The Executive Director of the Energy Commission has the overall responsibility for determining what information provided to the Energy Commission is confidential. This section outlines the application process.

The process for requesting a confidential designation for the data is described below. A more detailed description of this process is provided in Title 20 of the California Code of Regulations, Section 2501 et seq.<sup>5</sup>

Parties must make a separate, written application to the Executive Director that specifies which data within the body of all submitted material warrants a confidential designation. A document or electronic file bearing a “confidential” stamp will not suffice. A formal application is necessary.

The Executive Director needs the following information items to make a confidentiality determination:

- 1) A printed cover letter bearing the following address:

B.B. Blevins, Executive Director  
California Energy Commission  
1516 Ninth Street, MS 39  
Sacramento, California 95814-5504

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<sup>5</sup> Energy Commission regulations can be found at:  
<http://www.energy.ca.gov/2006publications/CEC-140-2006-001/CEC-140-2006-001.PDF>.

- 2) The data. For this data request, the data must be submitted on a compact disc that bears the name of the utility or ESP and the following sub-docket number: **Docket #06-IEP-1H**.
- 3) A completed *Application for Confidential Designation* form, and
- 4) A signed and dated “penalty of perjury” certification containing the following paragraph, signature line, and signature:

“I certify under penalty of perjury that the information contained in this application for confidential designation is true, correct, and complete to the best of my knowledge. I also certify that I am authorized to make this application and certification on behalf of the applicant.”

Please note that the “penalty of perjury” certification is included at the end of the *Application for Confidential Designation* form.

The four items listed above must be hand-delivered or mailed to the Executive Director’s office in a sealed package (or envelope) marked “Confidential.” The applicant must never send data that is part of its *Application for Confidential Designation* package directly to the Docket Unit.

An *Application for Confidential Designation* form in portable document format (PDF) is provided within this publication as Appendix A. If, however, the applicant must create its own version of this form for any reason (for example, more space on the form is needed to provide a thorough response), then the applicant’s version of the application must duplicate the Energy Commission’s *Application* word for word.

The *Application* submitted to the Executive Director must contain the following information:

- 1) Identification of the information being submitted, including title, date, file size (for example, pages, sheets, MB), and sub-docket number. For data submitted in an Excel Workshop, the *Application* should clearly list the specific rows, columns, or cell addresses containing the “confidential” data (for example, Form 1.a (IOU), cells C11 through Q 11).
- 2) Description of the data for which confidentiality is being requested;
- 3) Description of the length of time for which confidentiality is being sought, with an appropriate justification, for each confidential data category request;
- 4) Identification of applicable provisions of the California Public Records Act (Government Code Section 6250 *et seq.*), and/or other laws, for each confidential data category request;

- 5) A statement attesting either: (a) that the specific records to be withheld from public disclosure are exempt under provisions of the Government Code, or (b) that the public interest in non-disclosure of these particular facts clearly outweighs the public interest in disclosure; and
- 6) A statement that describes how each category of confidential data may be aggregated with other data for public disclosure.

Data for which the applicant seeks confidential designation must be submitted to the Executive Director with a cover letter and an *Application for Confidential Designation*. All other data must be sent to the Docket Unit. To separate confidential from public data, the applicant should create a public and a non-public version of each form (Excel Worksheet). If this approach is impractical,<sup>6</sup> then the applicant must submit one copy of the form containing both public and non-public (that is, data subject to a pending *Application*) data. The Energy Commission staff strongly encourages that the applicant visually separate the non-public data by providing it in red ink rather than black. This approach would facilitate protection of the non-public data and streamline the application-review process.

Application packages deemed incomplete will not be reviewed by the Executive Director. Instead, incomplete application packages will be placed in a “suspense” file and the filer will be notified by mail and by e-mail about the deficiencies in the application. The filer has 14 calendar days to correct the deficiencies and to deliver to the Executive Director replacement copies of the deficient cover letter, data (on compact disc and a printed copy), or complete *Application for Confidential Designation*, including the signed and dated “penalty of perjury” certification. If the Executive Director has not received the replacement copies after 14 calendar days from the date the letter was received, all information associated with the deficient application package will be deemed public information and docketed accordingly.

Once an application package is complete, the Executive Director of the Energy Commission has 30 days to decide on the confidentiality request. Confidentiality determination letters are signed by the Executive Director. If the letter states that the Executive Director has determined that the submitted data does not warrant confidential designation, then the applicant has 14 calendar days to appeal the Executive Director’s decision.

More specific questions about confidentiality may be directed to Fernando DeLeon at [fdeleon@energy.state.ca.us](mailto:fdeleon@energy.state.ca.us) or (916) 654-4873.

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<sup>6</sup> For example, “confidential” values could be determined by mathematical deduction from the public version of the form.

# **General Instructions for Retail Price Forecasting Forms**

The Energy Commission staff prepared a separate set of forms for IOUs and ESPs. IOUs need only complete forms designated with an “IOU.” Similarly, ESPs need only complete forms with “ESP.”

## **Provide Financial Data in Nominal Dollars**

Provide all financial data in nominal (current-year) dollars, rather than in real (or constant) dollars. Historical information should also be provided in nominal dollars.

The Energy Commission staff intends to convert all respondents’ financial data from nominal dollars to real dollars, using a Gross Domestic Product implicit price deflator series.

## **Provide Financial Data in Thousands of Dollars**

For many electric utilities, some categories of financial data will amount to millions of dollars each year. Round off all financial data to the nearest thousand of dollars. For example, \$15,000,000 would be reported as \$15,000.

## **Provide Data in Fiscal Year or Calendar Year**

All forms request only annual data. Some electric utilities maintain their financial records using a fiscal-year accounting system (for example, July 1 to June 30), while others use the calendar year (that is, January through December). Each utility or ESP may use either fiscal year or calendar year data to report (or project) annual data, depending on which accounting system they normally use to report financial data.

For utilities or ESPs that will report fiscal-year data, the “year” is the starting year of a fiscal year. For example, data requested for 2006 is data for Fiscal Year 2006-2007.

# **Instructions for Investor-Owned Utility Forms**

Forms 1.a through 1.c (IOU) were designed to collect annual financial and sales data useful for projecting average prices per kilowatt-hour by customer type. Form 1.a (IOU) collects revenue-requirement details. Form 1.b (IOU) captures how each IOU allocates revenue requirements among its bundled and DA customers. Form 1.c (IOU) gathers each IOU's forecasted retail electricity sales for bundled and direct access customers.

## **Instructions for Form 1.a (IOU)**

The purpose of this form is to learn what each IOU's major costs have been in the recent past and what it thinks its major costs might be over the next 10 years. For Years 2004 through 2006, IOUs are requested to report their California Public Utilities Commission (CPUC)-authorized revenue requirements, not actual costs.

Form 1.a (IOU) identifies 10 major revenue-requirement categories, most of which are based on the rate components displayed in IOUs' electricity bills for retail customers. These categories are Generation, Transmission, Distribution, Nuclear Decommissioning, Public Purpose Programs, Department of Water Resources (DWR) Bond Charge, Fixed Transition Amount/Trust Transfer Account, Ongoing Competitive Transition Charge, Regulatory Asset for Energy Recovery Bond (PG&E Only), Taxes and Franchise Fees, and Other Costs Not Already Reported.

The following instructions explain which financial information to report or project under these categories.

### ***Generation Revenue Requirements***

The IOUs must base their generation revenue requirements upon the same quantities and types of electricity supply that they reported to the Energy Commission in their electricity-resource-plan submittals (for example, responses in Supply Form S-2). The generation section of Form 1.a (IOU), therefore, does not ask the IOUs how much electricity they expect to generate or purchase each year.

The Energy Commission staff divided the generation section of Form 1.a into six subcategories: utility-owned/retained generation and five types of purchased power.

Utility-owned/retained generation means generation built or acquired by the IOU that is either placed in the rate base or treated as a cost-based asset for rate recovery purposes. The utility-owned/retained generation section is further subdivided into six types of power plants:

- Nuclear
- Conventional Hydroelectric
- Hydroelectric Pumped Storage
- Natural Gas-Fired Generation
- Coal
- RPS “Eligible” Renewables

Conventional hydroelectric generators and hydroelectric pumped storage facilities are defined here as facilities that do not qualify as eligible for California’s Renewables Portfolio Standard (RPS). The sole purpose of this definition is to avoid double-counting costs for electricity-generating facilities that are both hydroelectric and “RPS ‘Eligible’ Renewables.” Natural gas-fired generation includes all utility-owned/retained steam generation units, combined-cycle power plants, combustion turbines, and distributed generation facilities.

RPS “Eligible” Renewables are electricity-generating facilities that use one or more types of renewable energy resources or fuels to operate and that meet the RPS eligibility criteria. IOUs can aggregate revenue requirement dollar amounts for all types of renewable energy facilities.

The IOUs are requested to provide the following cost-related data for each type of utility-owned/retained generating facility: Fuel and Non-Fuel. Fuel-related revenue requirements are the sum of natural gas purchases, gas pipeline transportation, and gas storage. Non-Fuel revenue requirements are the sum of operations and maintenance (O&M) expenses, depreciation, return on investment, and all other costs.

For conventional hydroelectric generation, projected “fuel” costs are for water rights. “Fuel” costs for hydroelectric pumped storage are the energy costs associated with off-peak pumping.

For utility owned/retained generation that is natural gas-fired or coal-fired, please provide the average annual fuel price that was used to report and forecast generation-fuel revenue requirements. Report both of these fuel-price data series in dollars per million British Thermal Units.

The Energy Commission-provided Excel Worksheet will subtotal each year’s projected costs for each type of utility-owned generation. In addition, it will subtotal the revenue requirement amounts for all types of utility-owned generation.

Form 1.a (IOU) next asks each IOU to provide financial data on historical, authorized revenue requirements and projected expenses for four categories of purchased power:

- California Department of Water Resources (DWR) contracts
- Supply contracts



- Residual market transactions (that is, short-term and spot market purchases), and
- Payments to the California Independent System Operator for market charges.

The Energy Commission staff requests a breakout for each of the following types of DWR contracts:

- Must-take
- Capacity-charge/Economic Dispatch, and
- Renewables.

The Energy Commission staff also requests an expense breakout for the following three categories of Supply Contracts:

- Qualifying Facilities (QFs)
- Non-QF Renewables, and
- All Other Bilateral Contracts.

To avoid double counting, QF contract expenses that are recovered through the Ongoing Competitive Transition Charge (CTC) should not be included in this section of Form 1.a, because a row in the Excel Worksheet has been included for “Ongoing CTC” costs, including contract costs. Also, authorized revenue requirements and projected expenses for “Non-QF Renewables” contracts should not include “DWR Renewables” contracts.

The “All Other Bilateral Contracts” category is for reporting authorized revenue requirements and projected expenses for the sum of all other bilateral supply contracts. Examples of the types of bilateral contracts to include are:

- Forward energy
- Capacity
- Tolling agreement
- Physical call or put option

Form 1.a (IOU) has three final categories of supply contracts:

- Residual market transactions
- Payments to the California Independent System Operator for Market Charges, and
- Other resources.

Under “Residual Market Transactions,” the Energy Commission staff requests that IOUs report their authorized revenue requirements and projected expenses for electricity supplies purchased through both short-term contracts (that is, less than three months) and spot-market purchases (for example, forward spot).

Under "Payments to the California ISO for Market Charges," please report authorized revenue requirements and projected expenses for the following:

- Ancillary Services, including spinning reserves, non-spinning reserves, replacement reserves, regulation up, and regulation down;
- Market Uplifts, including emissions cost recovery, start up cost recovery; and
- Energy, including day-ahead, hour-ahead, and real-time.

Under "Other Resources," please provide cost projections for future power supplies not already reported in Form 1.a as "Utility-Owned Generation" or as a type of "Purchased Power," because the ownership of these supplies is unknown by the IOU at this time.

### ***Transmission Revenue Requirements***

This section of Form 1.a (IOU) is for collecting financial data regarding each IOU's Federal Energy Regulatory Commission (FERC)-jurisdictional transmission assets. Energy Commission staff requests annual transmission-related authorized revenue requirements and cost estimates using the following categories that are based on four FERC-approved rates:

- Base Transmission Revenue Requirement
- Transmission Revenue Balancing Account Adjustment
- Transmission Access Charge Balancing Account
- Reliability Services

"Base Transmission Revenue Requirement" includes transmission system operations and maintenance, depreciation, and return on investment.

"Transmission Revenue Balancing Account Adjustment" is an income credit for the California ISO's transmission line operations and includes wheeling, firm transmission rights, and congestion management charge revenues. The "Transmission Access Charge Balancing Account" enables IOUs to collect revenues to recover costs for using others' transmission systems. And the "Reliability Services" rate compensates IOUs for costs to operate reliability must-run generators for local voltage support.

To complete the "Base Transmission Revenue Requirement" row of this form, the IOUs are requested to provide authorized revenue requirements and projected expenses for network improvements (for example, line extensions and reliability upgrades) and large transmission projects it has identified in its five-year transmission plan with the California ISO. Beyond the term of its five-year plan (for example, 2011 or 2012), the IOUs are requested to provide cost estimates only for transmission network improvements.

## ***Distribution Revenue Requirements***

This section of Form 1.a (IOU) is for reporting authorized revenue requirements and projecting expenses for each IOU's CPUC-jurisdictional distribution assets.

Energy Commission staff requests data on the following expense categories be aggregated and reported in the row labeled "base margin."

- Operations and maintenance
- Depreciation and amortization
- Return on investment
- All other costs

"Operations and maintenance" expenses include supervision and engineering labor; load dispatching; substation, transformer, overhead and underground line operations; streetlight and signal operations; customer installation' and miscellaneous expenses.

In the row labeled "Customer Service," please report authorized revenue requirements and projected expenses for the following operating expenses:

- Meter reading and field service
- Customer records, billing, and collections
- Customer service and information
- Telephone center operations
- All other customer-service activities

In addition, the Energy Commission staff requests that IOUs provide information about authorized revenue requirements and projected costs to implement each of the following programs:

- Self-Generation Incentive Program
- Demand Response Program
- Advanced Metering Infrastructure, and
- California Solar Initiative

## ***Nuclear Decommissioning***

IOUs with cost responsibility for decommissioning a nuclear power plant are requested to report authorized revenue requirements and estimated future costs in this section of Form 1.a (IOU).

## ***Public Purpose Programs***

This section of Form 1.a (IOU) collects annual cost projections for implementing each of the following public purpose programs:

- Low-income programs (including subsidies for medical/life-support equipment users)
- Energy efficiency
- Public interest energy research and development, and
- Renewable energy

The Energy Commission staff seeks annual cost estimates only for those public-purpose programs that are funded by ratepayers through the electricity Public Goods Charge or Public Purpose Program Charge.

Although cost recovery for “procurement energy efficiency” is through a “Procurement Energy Efficiency Balancing Account” (PEEBA) surcharge, IOUs include the revenue requirement for PEEBA in their Public Purpose Program revenue requirement. Authorized revenue requirements and projected expenses for “energy efficiency” programs, therefore, should include both categories of ratepayer-funded energy efficiency programs.

## ***DWR Bond Charge***

The Energy Commission staff requests each IOU to provide its forecast of annual costs for DWR revenue bond charges.

## ***Fixed Transition Amount/Trust Transfer Account***

This section of Form 1.a collects each IOU’s annual forecast of costs associated with repaying revenue bonds issued to reduce rates for residential and small commercial customers under California’s electric industry restructuring plan. PG&E calls its rate reduction bond charge the “Fixed Transition Amount,” while SCE and SDG&E refer to it as the “Trust Transfer Account.”

## ***Ongoing Competitive Transition Charge***

Each IOU is requested to project total annual costs to be collected through the ongoing competitive transition charge. Energy Commission staff is not requesting a detailed break-out between generation (for example, CTC-eligible QF costs) and other costs included in this charge.

## ***Regulatory Asset for Energy Cost Recovery Bond (PG&E Only)***

Energy Commission staff requests that PG&E staff provide data on recent authorized revenue requirements and projected expenses for its Energy Cost Recovery Bonds.

## ***Taxes and Franchise Fees***

Please provide an annual estimate of future revenue requirements for taxes and franchise fees. Taxes may include federal income, State Corporation Franchise, property, payroll, business, and Superfund taxes. Franchise fees are those levied by city and county governments.

If an IOU's revenue requirement for "Taxes and Franchise Fees" is collected in another rate component (for example, Distribution) and the dollar amount has been included already in Form 1.a (IOU) within that rate component, then the IOU need not report its "Taxes and Franchise Fees" expense separately. It should leave the "Taxes and Franchise Fees" row blank and provide a note explaining which rate component includes the "Taxes and Franchise Fees" expense.

## ***Other Costs Not Already Reported***

Although the Energy Commission staff attempted to identify all major revenue requirement categories in Form 1.a (IOU), the IOUs are requested to include a forecast of any other costs not already reported. These "other" costs need not be named.

## ***Total Revenue Requirements***

The Excel Worksheet will add up all of the separate costs to produce total revenue requirements. The worksheet also duplicates the annual values for total revenue requirements onto the top rows of Form 1.b (IOU-Bundled) and Form 1.b (IOU-DA).

## Instructions for Form 1.b (IOU-Bundled)

Form 1.b (IOU-Bundled) was created to determine how each IOU will allocate its revenue requirements among its bundled-customer classes. (A separate form, Form 1.b (IOU-Direct Access) collects IOUs' projections on which portion of their total revenue requirements will be collected from direct-access customers: those receiving electricity supplies from an ESP but receiving electricity delivery services from the IOU.)

Form 1.b (IOU-Bundled) focuses on the rate components through which the IOU collects the majority of its revenue requirements: the generation component and the distribution component. Energy Commission staff requests each IOU to provide a detailed break-out of its total forecasted revenue requirements for the generation and distribution rate components.

All other revenue requirement categories (for example, transmission, Public Purpose Programs, etc.) should be aggregated. Please combine all other revenue requirement categories (for example, transmission, nuclear decommissioning, public purpose programs, DWR bond charge, rate reduction bond charge, ongoing CTC charge) in "All Other Revenue Requirements" section of Form 1.b (IOU-Bundled). Each IOU is asked to sum up annual revenue requirements for all of these other categories and then show on Form 1.b (IOU-Bundled) how much of this sum of "other revenue requirements" will be collected annually from each class of bundled customer, as defined below.

Form 1.b (IOU-Bundled) identifies five classes of bundled customers:

- Residential/Domestic
- Commercial
- Industrial
- Agricultural, and
- All other customer classes (for example, street lighting).

The customer classes listed above match those used by Energy Commission staff to forecast electrical demand, however, they may not match how some utilities define their commercial and industrial customer classes. Some IOUs define their commercial and industrial customers by size only (for example, "small," medium," and "large"), based on average monthly consumption and have rate schedules for similar-sized commercial and industrial customers. For example, small commercial and small industrial customers can be on the same rate schedule.

Thus, completing Form 1.b (IOU-Bundled) may be a challenge for IOUs with size-based systems for classifying commercial and industrial customers because rate schedules (and forecasted sales revenue) are not linked directly to discrete classes of "commercial" and "industrial" customers.

The Energy Commission staff recognizes this problem and recommends the following temporary solution. To overcome potential differences in how the Energy Commission and individual IOUs define “commercial” and “industrial” classes, the Energy Commission staff requests that those IOUs with size-based rate schedules use the following approach to assign rate schedules to either the commercial or industrial classes:

- Use rate schedules for small and medium-sized customers as the proxy for all “commercial” customers
- Use rate schedules for large-sized customers as the proxy for “industrial” customers.

## **Instructions for Form 1.b (IOU-Direct Access)**

The IOUs are requested to complete Form 1.b (IOU-Direct Access) by projecting the annual total of revenue requirements they intend to collect from DA customers. Energy Commission staff is not requesting a detailed breakout of projected costs by revenue-requirement category for this type of electricity customer. For example, the Energy Commission staff is not asking for a separate revenue-requirements forecast for the Direct Access Cost Responsibility Surcharge.

It does, however, request that each IOU separate and report the portion of its annual revenue requirements it intends to collect from the two types of DA customer: residential and non-residential (that is, all types of non-residential customer).

## Instructions for Form 1.c (IOU)

This form collects each IOU's sales data by selected bundled customer class and its projection of electricity sales by ESPs to direct access customers. The Energy Commission staff requests each IOU to provide a forecast of retail sales of electricity – in megawatt-hours (MWH) – by the following customer classes:

- Residential
- Commercial
- Industrial
- Agricultural, and
- All Other Customer Classes.

Forecasted retail sales provided by IOUs in Form 1.c should be consistent with the sales forecasts submitted earlier to the Energy Commission in the following Demand Forecast Forms:

- Forecast of Sales to Bundled Customers – Form 1.1 (Retail Sales of Electricity by Class or Sector).
- Forecast of Sales to Direct Access Customers – Form 6 (ESP Report of Loads and Resources under Contract).

Repeating its sales forecast may not be possible, however, if the IOU's previous response (provided in Forms 1.1 and 6) was based on the IOU's own method of classifying "commercial" and "industrial" customers. In completing Form 1.c, each IOU must use the same definitions of "commercial" and "industrial" as it used to complete Form 1.b (IOU-Bundled Customer).

Electricity sales projections to direct access customers are to be divided between residential and non-residential only.



## **Instructions for Form 2 (IOU)**

### **Utility-Specific Electricity Sales in 2005 by Commercial/Industrial Rate Schedule and Selected NAICS Categories**

Many California electric utilities classify their commercial and industrial customers by size (for example, small, medium, large, based on average monthly electric demand) rather than having separate classes for commercial and industrial customers. They assign businesses to rate schedules using this classification method; both commercial and industrial customers of similar size buy power under the same rate schedules. The purpose of this form is to enable the Energy Commission staff to determine – for utilities that classify their commercial and industrial customers by size only – which rate schedules represent a utility’s commercial customers and which represent its industrial customers.

A utility’s current rates are the starting point for Energy Commission forecasts of retail electricity prices. Since the Energy Commission staff forecasts retail prices by customer type (for example, commercial, industrial) rather than size, it must select rate schedules for each utility that represent current commercial and industrial retail prices. In the past, Energy Commission staff assumed that a utility’s rate schedules for “small” and “medium”-sized business customers were serving its “commercial” customers and its rate schedules for “large” businesses were serving its “industrial” customers. Information collected through this form will confirm or disprove that assumption. In the event that industrial accounts do not dominate any of the utility’s selected rate schedules, the staff will select the one rate schedule with the highest volume of electric sales to represent industrial customers.

With assistance from the Energy Commission’s Demand Analysis Office, the following North American Industry Classification System (NAICS) category codes were selected to define “commercial” businesses: 115, 2331, 326212, 42, 44-45, 48841, 493, 512, 514, 518-519, 52, 53, 54, 55, 561, 61, 62 (excluding 62191), 71, 72, 81 (excluding 81293 and 814), and 92 (excluding 92811).<sup>7</sup> The following NAICS category codes were selected to represent “industrial” businesses: 11331, 21, 23, 31-33, 511, and 54171.

The Energy Commission staff designed a unique form for each IOU that identifies the rate schedules in question by title and code. These rate schedules were selected by Energy Commission staff because the staff believes they represent the ones most commonly used by the utility’s commercial and industrial customers for buying electric service.

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<sup>7</sup> An explanation of NAICS category codes are provided at <http://www.census.gov/epcd/naics02/naicod02.htm>.

## **Instructions for Form 3 (IOU)**

### **Investor-Owned Utility Residential Electricity Sales by Baseline Percentages**

Residential customers of California's IOUs buy electricity under to a five-tiered pricing structure. Higher prices apply to electricity consumed in higher tiers. Tiers are defined as percentages of average monthly consumption. Tier 1 represents between 50 to 70 percent of average consumption. It also sets the "baseline" against which all other tiers are measured. Tier 2 represents between 101 and 130 percent of "baseline," Tier 3 is 131 to 200 percent, Tier 4 is 201 to 300 percent, and Tier 5 represents consumption greater than 300 percent. By state law, residential rates for Tiers 1 and 2 are "frozen" at prices paid in February 2001. Thus, all residential rate increases are borne by consumers whose monthly consumption exceeds 130 percent of baseline (that is, Tier 3 and above).

IOU data provided under Form 3 will enable Energy Commission staff to study electricity-sales distributions under the current five-tier pricing structure. These data will also be compared to similar sales data obtained in 2001.

The Energy Commission staff understands that IOUs maintain separate database records for residential accounts receiving by both electricity and natural gas service (called "basic" accounts) and those served by electricity only (called "all-electric" accounts). For ease of reporting, therefore, two versions of Form 3 are provided, one for reporting "basic" account data and one for "all electric" data. Both versions of Form 3 have been customized for each IOU to show its unique territory-labeling system and daily baseline quantities. The Energy Commission staff requests that each IOU complete both versions of Form 3 by providing residential electricity sales data for 2004 and for 2005 by baseline quantity (in 10 percent increments), territory, and season.

## **Survey of Residential Accounts' Exposure to High-Tier Rates**

The Energy Commission staff also requests data that answer the following questions:

- How many "basic" residential accounts in 2004 and in 2005 always consumed less than 130 percent of baseline so that their monthly bills were always within Tier 1 and Tier 2 rates? What were the total sales to these accounts in 2004? In 2005?
- How many "all electric" residential accounts in 2004 and in 2005 always consumed less than 130 percent of baseline so that their monthly bills were always within Tier 1 and Tier 2 rates? What were the total sales to these accounts in 2004? In 2005?

- How many “basic” and how many “all electric” residential accounts in 2004 consumed **more than 130 percent of baseline** so that at least one of their monthly bills included electricity priced at the Tier 3 rate? What were the total sales to these “basic” accounts in 2004? What were the total sales to these “all electric” accounts in 2004?
- How many “basic” and how many “all electric” residential accounts in 2005 consumed **more than 130 percent of baseline** so that at least one of their monthly bills in 2005 included electricity priced at the Tier 3 rate? What were the total sales to these “basic” accounts in 2005? What were the total sales to these “all electric” accounts in 2005?
- How many “basic” and how many “all electric” residential accounts in 2004 consumed **more than 200 percent of baseline** so that at least one of their monthly bills in 2004 included electricity priced at the Tier 4 rate? What were the total sales to these “basic” accounts in 2004? What were the total sales to these “all electric” accounts in 2004?
- How many “basic” and how many “all electric” residential accounts in 2005 consumed **more than 200 percent of baseline** so that at least one of their monthly bills in 2005 included electricity priced at the Tier 4 rate? What were the total sales to these “basic” accounts in 2005? What were the total sales to these “all electric” accounts in 2005?
- How many “basic” and how many “all electric” residential accounts in 2004 consumed **more than 300 percent of baseline** so that at least one of their monthly bills in 2004 included electricity priced at the Tier 5 rate? What were the total sales to these “basic” accounts in 2004? What were the total sales to these “all electric” accounts in 2004?
- How many “basic” and how many “all electric” residential accounts in 2005 consumed **more than 300 percent of baseline** so that at least one of their monthly bills in 2005 included electricity priced at the Tier 5 rate? What were the total sales to these “basic” accounts in 2005? What were the total sales to these “all electric” accounts in 2005?

IOUs may use their own format to provide answers to the above-listed questions or they may use the “basic” and “all-electric” tables on the following page.

<b>“Basic” Residential Accounts’ Exposure to High-Tier Rates</b>				
<b>Monthly Electricity Bills...</b>	<b>2004</b>		<b>2005</b>	
	<b>No. of Accounts</b>	<b>Total Annual Sales to these Accounts (kWh)</b>	<b>No. of Accounts</b>	<b>Total Annual Sales to these Accounts (kWh)</b>
<b>Always within Tier 1 and Tier 2</b> (under 130% of baseline)				
<b>At least one bill this year included Tier 3-priced electricity</b> (above 130% of baseline)				
<b>At least one bill this year included Tier 4 electricity</b> (above 200% of baseline)				
<b>At least one bill this year included Tier 5 electricity</b> (above 300% of baseline)				

<b>“All Electric” Residential Accounts’ Exposure to High-Tier Rates</b>				
<b>Monthly Electricity Bills...</b>	<b>2004</b>		<b>2005</b>	
	<b>No. of Accounts</b>	<b>Total Annual Sales to these Accounts (kWh)</b>	<b>No. of Accounts</b>	<b>Total Annual Sales to these Accounts (kWh)</b>
<b>Always within Tier 1 and Tier 2</b> (under 130% of baseline)				
<b>At least one bill this year included Tier 3-priced electricity</b> (above 130% of baseline)				
<b>At least one bill this year included Tier 4 electricity</b> (above 200% of baseline)				
<b>At least one bill this year included Tier 5 electricity</b> (above 300% of baseline)				

## Instructions for Form 4 (IOU)

### Pricing Factors for Purchased Power

The purpose of Form 4 is to collect data on how prices for electricity bought through bilateral contracts can change during the term of those contracts. Within a supply contract, cost components (for example, O&M, fuel) are allowed to increase or decrease according to an escalation factor or price index assigned to the component. The data collected through Form 4 will enable the Energy Commission staff to analyze the sensitivity of purchased-power prices to changes in various price indices and escalation factors.

Each IOU is requested to sort its purchased power contracts by type of contract. Form 4 (IOU) lists four types of power supply contracts: DWR contracts; qualifying facility (QF) contracts; contracts for renewable energy, excluding QF contracts; and all other bilateral contracts. Do not include power purchased through residual market transactions (for example, short-term and spot market purchases) on this form.

For each type of contract, the IOU must determine which ones contain price indices or other escalation factors, such as the following:

- Natural gas price index,
- Inflation index, such as the Producer Price Index or Consumer Price Index
- Wholesale electricity price index, such as *Bloomberg*

For each type of contract (for example, DWR contracts), the IOU is requested to determine the annual values of power purchases that will be indexed to the price of natural gas and to report those annual dollar values on Form 4. On the next line, provide the natural gas price index that will be used or if different natural gas price indices are included in different DWR contracts, please calculate the weighted average of all natural gas price indices.

The IOU is requested to calculate the annual values of power purchases tied to all other price escalators or indices and provide those annual values on Form 4. On the next line of Form 4, please provide the escalation factor that will be used, or the weighted average of the escalation factors that will be used.

In the last two lines of each contract-type section, the IOU is asked to provide the subtotal of values for its power purchases that are fixed-price. Fixed price energy contracts should be reported separately from fixed price capacity contracts.

# **Instructions for Energy Service Provider Forms**

Forms 1 and 4 were designed to collect cost data on ESPs' existing power-supply contracts, based on their current contracted load (direct access customers) as reported to the Energy Commission in Demand Forecast Form 6.

Both Forms 1 and 4 request historical cost data from 2004 through 2006 and future costs over a short forecast period, from 2007 through 2011.

The Energy Commission staff understands that ESPs incur costs other than power supply contracts to serve their direct access customers. To prepare a retail price forecast for direct access customers, therefore, the Energy Commission staff will need to determine an appropriate "mark-up" factor to the power-supply costs by which to represent these other costs. A "survey" question is included in this data request to solicit a "mark-up" factor appropriate for each ESP.

## **Instructions for Form 1 (ESP) Estimated Power Supply Costs**

The Energy Commission staff requests each ESP to provide data on its historical and future power-supply costs to serve existing DA customers. Two power-supply cost categories are provided:

- Bilateral contracts, and
- Residual market transactions.

The Energy Commission staff requests an annual estimate of historical and future costs for all supply contracts, regardless of resource type or ESP-ownership interest. Supply contracts defined as bilateral contracts are contracts for energy and/or capacity entered into in advance of the delivery time. Bilateral contracts include capacity-only contracts to meet resource adequacy requirements.

Residual market transactions are short-term (less than three months) or spot-market purchases of electricity from suppliers other than the California ISO. The Energy Commission staff is not requesting an ESP cost forecast of payments to the California ISO for market charges.

## **Instructions for Form 4 (ESP) Pricing Factors for Purchased Power**

The purpose of Form 4 (ESP) is to collect data on how prices paid for electricity that is purchased through bilateral contracts can change during the term of those contracts. Cost components within a supply contract (for example, O&M, fuel) are

allowed to increase or decrease according to an escalation factor or price index assigned to each cost component. The data collected through Form 4 (ESP) will enable the Energy Commission staff to analyze the sensitivity of purchased power to changes in the price of natural gas and other escalators.

Each ESP is requested to separate its renewable resource power contracts from all other types of bilateral contracts. ESPs should not include power purchased through residual market transactions (for example, short-term and spot market purchases) on this form.

For its renewable contracts, the ESP must determine whether any of these contracts contain price indexes or escalation factors. The following list provides examples of possible price indices or escalators:

- Those indexed to the price of natural gas,
- Those that based on a published price for wholesale electricity, such as *Dow Jones*.
- Those that do not escalate, such as fixed price contracts.

For all of its other types of bilateral contracts, the ESP must also determine whether any of these contracts contain price indexes or escalation factors.

For all renewable contracts with natural gas price indices or other price escalators, the ESP must calculate the value of energy within these contracts that is tied to natural gas prices and the value of energy tied to all other price escalators. Report both values in the rows provided on Form 4.

ESPS must also calculate the total value of all renewable contracts that are fixed price and report this sum on Form 4. If some renewable contracts are capacity contracts and others are fixed-price energy contracts, then the ESP should separate these two types of fixed-priced contracts and report their values separately in the rows provided on Form 4.

If more than one renewable contract has a natural gas price index, but different renewable contracts contain different natural gas price indices, then the ESP is requested to calculate a weighted average natural gas price index and report this price index on Form 4. Similarly, if more than one renewable contract has another type of escalation factor and different contracts have different “other” price factors, then the ESP is requested to calculate the weighted average of these other factors and report the weighted average price of these other factors on Form 4.

For all other types of bilateral contracts, the ESP is requested to repeat the same process:

- Identify which contracts have natural gas price indices
- Calculate the value of purchases priced to natural gas

- Provide the natural gas price index that will be used or calculate a weighted average of all natural gas price indices
- Identify which contracts have other escalation factors
- Calculate the value of purchases priced by these other escalation factors
- Provide the other escalation factor that will be used or calculate the weighted average of all other escalation factors
- Identify the value of all other bilateral contracts that are fixed price
- Separate these fixed priced contracts between capacity and energy contracts
- Calculate the value for all fixed-price energy contracts and all fixed-price capacity contracts
- Provide all of these values in the rows provided on Form 4.

## **Survey of ESPs' Other Costs**

The Energy Commission staff requests additional information on the scope and magnitude of ESPs costs to serve direct access customers other than power-supply costs. Please provide a written response to each of the following questions:

1. What were your historical costs for California ISO for market and transmission charges in 2004, 2005, and 2006?
2. If the cost to purchase power supplies to serve current contracted load (existing direct access customers) averaged \$X per MWh, what would be an appropriate mark-up factor or percentage to that power-supply value to represent all other costs to the ESP? These costs include payments to the California ISO for market and transmission charges, marketing and sales, metering and billing, customer service and information, general and administrative, regulatory expenses, and profit.



## **Appendix A: *Application for Confidential Designation***

# APPLICATION FOR CONFIDENTIAL DESIGNATION

(Title 20 Cal. Code. Regs., § 2505 et seq.)

TO: ENERGY COMMISSION EXECUTIVE DIRECTOR, MS-39

ENERGY COMMISSION CONTRACT/DOCKET NO. (IF APPLICABLE):

APPLICANT: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

- 1(a). Title, date, and description (including number of pages) of the information or data for which you request confidential designation. **Information or data seeking a designation of confidentiality must be included with this application.**

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- 1(b). Specify the part(s) of the information or data for which for which you request confidential designation.

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2. State and justify the length of time the Energy Commission should keep the information or data confidential.

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- 3(a). State the provision(s) of the Public Records Act (Gov. Code, § 6250 et seq.) or other law that allows the Energy Commission to keep the information or data confidential, and explain why the provision(s) apply to that material.

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- 3(b). Discuss the public interest in nondisclosure of the material submitted for a confidential designation. If the material contains trade secrets or its disclosure would otherwise cause loss of a competitive advantage, please state how it would be lost, the value of the information to the applicant and the ease or difficulty with which the information could be legitimately acquired or duplicated by others.

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4. State whether the information or data can be disclosed if it is aggregated with other information or masked to conceal certain portions (including but not limited to the identity of the applicant). State the degree of aggregation or masking required. If the data cannot be disclosed even if aggregated or masked, explain why.

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5. State how the material is kept confidential by the applicant and whether it has even been disclosed to a person other than an employee of the applicant. If it has, explain the circumstances under which disclosure occurred.

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I certify under penalty of perjury that the information contained in this application for confidential designation is true, correct, and complete to the best of my knowledge and that I am authorized to make the application and certification on behalf of the applicant.

Dated: \_\_\_\_\_

Signed: \_\_\_\_\_

Name (print or type): \_\_\_\_\_

Title: (print or type)\_\_\_\_\_

Representing:\_\_\_\_\_

Include additional signature blocks if there are multiple partners in the project with shared responsibilities for making the request.